

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

STATE OF OKLAHOMA, ex rel.)
W. A. DREW EDMONDSON, in his capacity as)
ATTORNEY GENERAL OF THE STATE OF)
OKLAHOMA and OKLAHOMA SECRETARY)
OF THE ENVIRONMENT J. D. STRONG,)
in his capacity as the TRUSTEE FOR NATURAL)
RESOURCES FOR THE STATE OF OKLAHOMA,)

Plaintiffs,)

vs.)

05-CV-0329 GKF-PJC

TYSON FOODS, INC., TYSON POULTRY, INC.,)
TYSON CHICKEN, INC., COBB-VANTRESS, INC.,)
CAL-MAINE FOODS, INC.,)
CAL-MAINE FARMS, INC., CARGILL, INC.,)
CARGILL TURKEY PRODUCTION, LLC,)
GEORGE'S, INC., GEORGE'S FARMS, INC.,)
PETERSON FARMS, INC., SIMMONS FOODS, INC.,)
and WILLOW BROOK FOODS, INC.,)

Defendants.)

**MOTION TO FILE UNDER SEAL CERTAIN EXHIBITS
TO DEFENDANTS CARGILL, INC. AND CARGILL TURKEY PRODUCTION, LLC'S
MEMORANDUM IN OPPOSITION TO
PLAINTIFFS' MOTION FOR PARTIAL SUMMARY JUDGMENT**

Defendants Cargill, Inc. and Cargill Turkey Production, LLC (Cargill Defendants) hereby request this Court for permission to file certain exhibits under seal to their forthcoming Memorandum in Opposition to Plaintiffs' Motion for Partial Summary Judgment. In support of this motion, the Cargill Defendants state as follows:

1. The Cargill Defendants are in the process of preparing their Memorandum in Opposition to Plaintiffs' Motion for Partial Summary Judgment Motion for Summary Judgment to be filed on June 5, 2009.

2. In support of this Memorandum in Opposition, the Cargill Defendants intend to attach certain documents as Exhibits that have been designated as confidential or for attorneys' eyes only pursuant to the terms of the November 21, 2006 Confidentiality Order. Dkt. 985.

3. To prevent the disclosure of confidential information, the Cargill Defendants seek an Order allowing them to file said exhibits under seal. The Cargill Defendants make this request now to insure compliance with General Order 06-09, PACER Redactions.

4. Plaintiffs' counsel has been contacted and does not object to this request.

WHEREFORE, premises considered, Defendants Cargill, Inc. and Cargill Turkey Production, LLC hereby request this Court to allow them to file under seal unredacted versions of certain exhibits to their Memorandum in Opposition to Plaintiffs' Motion for Partial Summary Judgment.

Dated: June 5, 2009

Respectfully submitted,

RHODES, HIERONYMUS, JONES,
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PRODUCTION LLC**

CERTIFICATE OF SERVICE

I certify that on the 5th day of June, 2009, I electronically transmitted the attached document to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants:

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I also hereby certify that I served the attached documents by United States Postal Service, proper postage paid, on the following who are not registered participants of the ECF System:

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